FILED

MAY 29 2008

CLERK, U S DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY [signature] DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

In Re A.A. (Juvenile), L.A. (Juvenile), H.C. (Juvenile), K.W. (Juvenile), Material Witnesses.	Magistrate Case No. 08mj1698 Related to Case No. 08CR0274-LAB COMPLAINT FOR VIOLATION OF; Title 18, U.S.C., Sec. 3144 - Material Witness

The undersigned Complainant, being duly sworn, states:

From on or about August 1, 2007, until and including October 11, 20007, in the Southern District of California, the above-named material witnesses, were recruited, persuaded, induced, enticed, harbored, and transported by Defendants JORDAN ARNOLD, CHRISTOPHER BLACK, and JESSICA KING, charged in Indictment Number 08CR0274-LAB, who knew the material witnesses had not attained the age of 18 years, knew the material witnesses would be caused to engage in commercial sex acts, namely prostitution, and were to benefit financially from the acts of prostitution performed by the material witnesses.

COMPLAINANT FURTHER STATES THAT the material witnesses have provided evidence that is material to the charges alleged in Criminal Case Number 08CR0274-LAB and that their presence is required in order to prosecute the case against the defendants.

COMPLAINANT FURTHER STATES THAT the material witnesses are all juveniles and are not currently living in the residences of their respective legal guardians. Securing the material witnesses' presence by subpoena, therefore, would be difficult in the absence of their status as material witnesses with legal representation. The above-referenced juveniles, therefore, should be permitted to remain out of custody on bail as material witnesses pursuant to Title 18, United States Code, Section 3144.

This complaint is based on the statement of facts which are incorporated herein.

Celina M Navarro
CELINA NAVARRO
Special Agent, FBI
U.S. Department of Justice

SWORN AND SUBSCRIBED TO IN MY PRESENCE
THIS 29th DAY OF MAY, 2008.

Jan M. Adler
HON. JAN M. ADLER
U.S. MAGISTRATE JUDGE

STATEMENT OF FACTS

From on or about a date unknown, but no later than August 1, 2007, to and including October 11, 2007, defendants JORDAN ARNOLD, CHRISTOPHER BLACK, and JESSICA KING recruited, persuaded, and transported material witnesses A.A., L.A., H.C., and K.W. (hereinafter "the material witnesses"), who were all females under the age of 18, to perform acts of prostitution (the exchange of sex acts for money) for the defendants' financial benefit.

Defendants ARNOLD and BLACK recruited and enticed, and Defendant KING aided and abetted, the material witnesses to perform acts of prostitution, the proceeds from which the defendants intended to, and did, receive and keep.

Defendants instructed the material witnesses how to solicit customers for acts of prostitution ("dates"), including how to dress, how to pose for photographs used in internet ads soliciting dates, what language to use in internet ads soliciting dates, how to post internet ads soliciting dates, what language to use on the telephone or in person to solicit dates, how to perform sex acts, and how much money to charge in exchange for the performance of particular sex acts with customers.

Defendants took digital photographs of the material witnesses, as the material witnesses wore lingerie and posed provocatively. The photographs were subsequently saved onto computers and uploaded onto the internet and the Craigslist website to create ads soliciting dates. Defendants then posted, or helped the material witnesses post, ads onto the Craigslist website to solicit dates.

Defendants ARNOLD and BLACK provided telephones to the material witnesses for the material witnesses to receive telephone calls from customers responding to ads posted on Craigslist soliciting dates, and for the material witnesses to contact one of the defendants to pick up the material witnesses from a hotel or elsewhere after completion of a date.

Defendants drove the material witnesses to hotels and other locations within the Southern District of California to perform sex acts with customers solicited through ads placed on Craigslist, and subsequently picked up the material witnesses from the same locations after acts of prostitution had been completed.

Defendants are currently facing charges of Sex Trafficking of Children, in violation of Title 18, U.S.C., Sections 1591(a)(1), (a)(2), (b)(2), and 2, and Coercion and Enticement of Juveniles into Prostitution, in violation of Title 18, U.S.C., Sections 2422(b) and 2, (a)(2), as charged in Indictment No. 08CR0274-LAB.